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8 UNITED STATES DISTRICT COURT
9 FOR THE EASTERN DISTRICT OF WASHINGTON

10 UNITED STATES OF AMERICA,)
11)
12 Plaintiff,) 2:23-CR-0036-TOR-1
13 v.) SENTENCING MEMORANDUM
14 BRIAN JESUS ZAZUETA,)
15)
16 Defendant.)
17

18 Plaintiff, United States of America, by and through, Vanessa R. Waldref,
19 United States Attorney for the Eastern District of Washington, and Caitlin Baunsgard,
20 Assistant United States Attorney for the Eastern District of Washington, submits the
21 following Sentencing Memorandum.
22

23 **A. PRE-SENTENCE INVESTIGATION REPORT:**
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25 The United States noted its objection to the draft PSIR. *See* ECF. 293.
26 Pursuant to the terms of the Plea Agreement, the United States stands by its objection.
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1 The United States submits the Defendant's guideline range should be 210-262
2 months.

3 **B. SENTENCING RECOMMENDATION:**

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5 Based on the totality of the circumstances, the United States is recommending
6 the Court accept the Plea Agreement and sentence the Defendant to 180-months of
7 incarceration to be followed by a 5-year term of supervised release. The United States
8 respectfully submits such a sentence would be sufficient but not greater than necessary
9 to accomplish the goals of sentencing and achieve an appropriate balance of the 18
10 U.S.C. § 3553(a) factors.
11

12
13 The Defendant comes from a large, prestigious family of drug dealers. The
14 Defendant's family has been so pervasive and persistent in this endeavor, his father,
15 Adolfo ZAZUETA-BUENO¹, a fugitive from this district in his own right, has
16 appeared to replace the Defendant's uncle Cesar BUENO-MARTINEZ (who was
17 recently killed in Culiacan, Sinaloa), as a member of the Sinaloa cartel, aligned with
18 the notorious Damaso LOPEZ NUNEZ family.² Several of the Defendant's siblings
19 and cousins are running their own "hotlines" of drug distribution into the EDWA
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25 ¹ See 08-CR-137-WFN. As noted in the PSIR, his mother is also involved in the family
26 business. See PSIR at p. 25 fn. 6.

27 ² See e.g. <https://x.com/LatamObscuro/status/1754586792446374317> (last accessed
28 September 1, 2024); <https://www.borderlandbeat.com/2024/02/blog-post.html> (last
accessed September 1, 2024).

1 sourced by the BUENO family³. The adage for the last decade is that there is not a
2 drug case here in the EDWA that does not involve “Bueno dope”. When the Drug
3 Enforcement Administration learned the Defendant was in town and likely staying at
4 the stash house in the Tri-Cities, they fast-tracked their operation to be able to arrest
5 the Defendant before he returned to Mexico. *Accord* PSIR at p. 24 ¶ 160.

7 It is with this backdrop that the Defendant finds himself before the Court,
8 somewhat unsurprisingly, to answer for his role in continuing his family’s role in
9 significant drug trafficking in the EDWA. This is not a drug user who was selling
10 dope to get by and got in over his head. *See e.g.* PSIR at p. 26 ¶¶ 169-174. Rather,
11 this is drug distribution for profit. According to one witness, the Defendant would
12 talk to his father just about every day and update him on what was going on in the
13 local business. Another witness described the Defendant as Adolfo’s “right hand
14 man” who, as a dual citizen, could easily travel to and from the United States and
15 Mexico through traditional routes, helping his family maintain their empire. *Accord*
16 PSIR at p. 24.

17 Importantly, however, as ancient principles direct, the sins of the father should
18 not be attributed to the son. The Defendant is only 23 years old and has clearly been
19 raised in an environment where engaging in this type of conduct is not aberrant
20 behavior; rather, it is likely expected and a conditioned response. He does not have

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27 ³ *See e.g.* 2:23-CR-00112-MKD; 2:23-CR-15-TOR; 2:22-CR-19-MKD; 2:22-CR-18-
28 RMP; 2:22-CR-68-TOR; 4:22-CR-6035-MKD; 2:22-CR-73-TOR; 2:21-CR-139-SAB;
4:21-CR-60174-TOR.

1 any criminal history and appears to have never spent time in custody prior to this case.
2 Certainly, the Defendant is an adult, responsible for his own choices and there is no
3 question he knew what he was doing, to include the volume of drugs he was
4 responsible for trafficking into the EDWA community.
5

6 Given the totality of the circumstances presented here, the United States
7 believes that a sentence of 180 months properly balances the 18 U.S.C. § 3553(a)
8 factors and provides a reasonable sentence under these facts and circumstances.
9

10 DATED this 29th day of October 2024.

11 Vanessa R. Waldref
12 United States Attorney

13 *s/ Caitlin Baunsgard*
14 Caitlin Baunsgard
15 Assistant United States Attorney

16 **CERTIFICATE OF SERVICE**

17 I hereby certify that on October 29, 2024, I electronically filed the foregoing
18 with the Clerk of the Court using the CM/ECF system, and will email notification of
19 such filing to the following:
20

21 Amy Rubin
22

23 *s/ Caitlin Baunsgard*
24 Caitlin Baunsgard
25 Assistant United States Attorney
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